

TOWNSEND & ASSOCIATES LLC.  
ATTORNEYS AT LAW

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Celeste P. Holpp, Esq.	Tyrone Townsend
COMPANY:	DATE:
Norman, Wood, Kendrick & Turner	4/16/2007
FAX NUMBER (205) 251-5479	TOTAL NO. OF PAGES INCLUDING COVER:
	7
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
(205) 259-1035	252-3999
RE: NOTICES OF DEPOSITION FOR CHRISTOPHER BROWN & LENAY MARTIN <u>Shyandrea Hester, et. al. v. Lowndes</u> <u>County Commission, et. al.</u>	
YOUR REFERENCE NUMBER:	

☐ URGENT    ☒ FOR REVIEW    ☐ PLEASE COMMENT    ☒ PLEASE REPLY    ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Please see the attached Notices of Deposition. I will also send a copy of the notices in the mail.

Thanks.

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334 SIXTH AVENUE SOUTH  
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205-252-3999  
205-252-3090 FAX



**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

SHYANDREA AND MARY  
HESTER, et al.,

Plaintiffs,

v.

LOWNDES COUNTY COMMISSION,  
CHRISTOPHER BROWN,  
EMERGYSTAT, DEPUTY JIMMY  
HARRIS, et al.,

Defendants.

CIVIL ACTION NO.:  
CV-06-572-WHA

**NOTICE OF TAKING DEPOSITION**

TO: Celeste P. Holpp, Esq.  
NORMAN, WOOD, KENDRICK & TURNER  
Financial Center - Suite 1600  
505 20<sup>th</sup> Street North  
Birmingham, Alabama 35203

You are hereby notified that the Plaintiffs, SHYANDREA AND MARY  
HESTER, et al., will take the testimony by deposition of **CHRISTOPHER BROWN**,  
upon oral examination for the purpose of discovery or for use as evidence in this cause,  
or for both purposes, in accordance with the Alabama Rules of Civil Procedure, at the  
offices of WEBB & ELEY, PC, 7475 Halcyon Pointe Drive, Montgomery, AL 36124, on  
**Tuesday, May 15<sup>th</sup>, 2007, at 10:30 a.m.**, before a court reporter, notary public, or some  
other person authorized by law to administer oaths and take depositions. The examination

will continue from day to day until completed. You are invited to attend and cross-examine.

Pursuant to Alabama Rules of Civil Procedure, notice is being given that the deponent is requested to produce at the time of the deposition, for inspection and copying the following documents or things:

1. Any and all reports, documents, other memoranda in Christopher Brown's possession involving the subjects, of this incident on May 28<sup>th</sup>, 2004.
2. A copy of the company policy and procedures manual, regarding the duties and procedures to be followed by Emergency Medical Technicians or Supervisors at Emergystat, Inc.

Respectfully submitted,

s/Tyrone Townsend  
TYRONE TOWNSEND  
Attorney for Plaintiffs  
State Bar I.D. No.: ASB TOW006  
P.O. Box 2105  
Birmingham, Alabama 35201  
Tel: (205) 252-3999  
TTownsl@msn.com

**OF COUNSEL:**

James Earl Finley  
Attorney at Law  
P.O. Box 91  
Trussville, Alabama 35173  
Tel: (205) 655-9286  
Fax: (205) 655-9287  
E-mail: [Finleylawfirm@aol.com](mailto:Finleylawfirm@aol.com).

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document on all counsel of record by placing a copy of the same in the U.S. mail, postage prepaid and properly addressed on this the 16th day of April, 2007, as follows:

Celeste P. Holpp, Esq.  
NORMAN, WOOD, KENDRICK & TURNER  
Financial Center - Suite 1600  
505 20<sup>th</sup> Street North  
Birmingham, Alabama 35203

s/Tyrone Townsend  
TYRONE TOWNSEND  
Attorney for Plaintiffs  
State Bar I.D. No.: ASB TOW006  
P.O. Box 2105  
Birmingham, Alabama 35201  
Tel: (205) 252-3999  
TTowns1@msn.com